HEARING DATE: AUGUST 25, 2009

CASE NO. 09-22261 RDD

HEARING TIME: 10:00 A.M.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: OLGA D. PAREDES

ssn: ***-**-6072

NOTICE OF MOTION

Debtor.

PLEASE TAKE NOTICE: that a Motion will be made before the Honorable Robert D. Drain on the 25th day of August 2009 at 10:00 a.m. at the Southern District Bankruptcy Court located at 300 Quarropas Street, White Plains, NY 10601 objecting to Proof of Claim #4 filed by PHH Mortgage Corporation, Inc. and a request for accounting.

PLEASE TAKE FURTHER NOTICE: that any response to the Motion must be made and received by counsel for the Debtor's with a copy to Chambers on or before August 18, 2009.

DATED: July 14, 2009

New York, New York

DAVID B. SHAEV (dbs6994)

Attorney for Debtor

350 Fifth Avenue, Suite 7210 New York, New York 10118

(212) 239-3800

TO:

Jeffrey L. Sapir Chapter 13 Trustee 399 Knollwood Road Suite 102 White Plains, NY 10603

United States Department of Justice Office of the United States Trustee Southern District of New York 33 Whitehall Street, 21st Floor New York, NY 10004 PHH Mortgage Corp. 4001 Leadenhall Road Mail Stop: SVRP Mt. Laurel, NJ 08054

Shapiro & DiCaro, LLP 250 Mile Crossing Boulevard Suite One Rochester, NY 14624 Attn: Anne E. Miller-Hulbert